

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KALEB COLE,

Defendant.

NO. CR20-032JCC

GOVERNMENT'S MOTION REGARDING
CERTAIN CUSTOMS AND BORDER
PROTECTION DOCUMENTS REGARDING
KALEB COLE

NOTE ON MOTION CALENDAR:
July 17, 2020

The United States moves pursuant to Rule 16(d)(1) for a protective order restricting the dissemination of a limited amount of discovery in this matter pertaining to Kaleb Cole. The documents relate to an encounter that law enforcement had with Cole prior to the time that the plot in this case came into existence. Although the materials arguably are not discoverable, the government wishes to produce the materials to the defense out of an abundance of caution. The materials, however, relate to a sensitive law enforcement technique that the investigative agency wishes to protect, and not be widely disseminated.

Accordingly, the government proposes the attached protective order which (1) grants Cole and his defense team access to the material; (2) restricts the dissemination of

1 the materials outside the defense team; (3) requires that the materials either be returned or
2 destroyed at the end of the pendency of the case, including any appeals.

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4 DATED: July 7, 2020

5 Respectfully submitted,

6 BRIAN T. MORAN
7 United States Attorney

8
9 /s/ Thomas M. Woods

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s).

/s/Teresa Hierro-Terrell

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